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July 1, 2021

BY ECF

The Honorable Laura Taylor Swain
Chief United States District Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Jonathan Smith, 20 Cr. 317 (LTS)

Dear Chief Judge Swain:

On behalf of Jonathan Smith, I respectfully submit this letter to request an additional brief extension of time for our submission of Mr. Smith's objections to the Presentence Investigation Report ("PSR").

This is our second request for an extension of the time to submit objections to the PSR. On June 22, 2021, I requested a one-week extension of the deadline, primarily because one of our conversations with our incarcerated client regarding the PSR was scheduled for a time after the deadline for objections would otherwise have passed. Your Honor granted that request.

We now write for this additional brief extension because, in preparing the PSR, the Probation Department cited to and relied upon documents that we had not seen before, and it was not until yesterday that we were able to review those documents in person at the Probation Department. Given the need to incorporate our review of these documents into our objections letter and to finalize that letter, we request that our current deadline of July 2 be extended to July 6 (which, due to the holiday weekend, is an extension of only one business day).

We have discussed this request with the Probation Department, and while the Probation Officer with whom we communicated indicated that she cannot take a formal position on our request, she also indicated that extending the deadline for our submission to July 6 should still

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give Probation adequate time to review the objections and circulate the final PSR on the currently scheduled date.

We thank the Court for its consideration of this request.

Respectfully submitted,



Robert M. Radick

cc: Assistant U.S. Attorney Thomas John Wright (by email and ECF)
Kristen M. Santillo, Esq. (by email and ECF)
Probation Officer Christopher F. Paragano (by email)

The foregoing request is granted. DE 51 is resolved.

SO ORDERED.

7/1/2021

/s/ Laura Taylor Swain, Chief USDJ